

**United States Bankruptcy Court**  
**Eastern District of Michigan**

In re Tamara Lynn Stokes

Case No. 13-41341

In re William Harvey Stokes

Chapter 13

**Ex Parte Motion to Vacate Dismissal and Reinstate the Case**

Now comes Kathleen Brown, attorney for Tamara Stokes and William Harvey Stokes, and respectfully moves this Honorable Court to vacate the dismissal of the case and to reinstate it. In support of her motion, she states as follows;

1. The case has been dismissed because the Stokes are not current on their installment payments.
2. Initially, the Stokes did not understand that they were supposed to be paying monthly installment payments.
3. The Stokes fell behind and told their attorney that they could not catch up.
4. Their attorney filed a motion to excuse arrearages, which was dismissed.
5. The Stokes want to work with the Court and come up with a suitable plan.
6. Their attorney suggests that they might want to get a second opinion.
7. The Stokes have been very cooperative with their attorney and met several times with her. They have provided all the documentation that she has asked for.
8. The Stokes' income continues to vary and mostly go down.
9. The Stokes' attorney is just not sure how to obtain a meeting of the minds here vis-à-vis the Court and the Stokes.
10. Understandably, the Trustee's office has said that they cannot give out legal advice.
11. The Stokes have made several payments and also paid a filing fee, which Counsel does not want them to lose.
12. Counsel is respectfully requesting the Court in its discretion set the matter for whatever Court date is suitable so that the Stokes can get a plan in place to pay their creditors.

*Wherefore*, Counsel prays for the relief requested, that of vacating the dismissal and reinstating the case.

Respectfully submitted by:

/s/ Kathleen Brown \_\_\_\_\_ Dated: 2/6/2014 \_\_\_\_\_

Kathleen Brown P46559

Attorney for Tamara and William Stokes

308 N. River

Ypsilanti, MI 48198

734.572.7663